

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Complaint on Sunday
and Holiday Collections

Docket No. C2001-1

OBJECTION OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORIES OCA/USPS-1(a-e, i), 3 - 10, 12 - 13
(June 8, 2001)

OCA interrogatories 1 - 14 were filed on May 22, 2001. The Postal Service requested an extension of time to object or respond, and an extension of time to file objections was granted until June 8, 2001. The Postal Service hereby objects to parts a-e and i of question 1, and all of questions 3-10 and 12-13.

The scope of this proceeding is limited to collection and mailing processing services provided on holidays. Discovery in this case should not be converted into a fishing expedition on postal operations practices generally. The Postal Service objects to responding to any questions that lack a clear and direct nexus to holiday mail processing and collection service matters. All of the interrogatories listed above suffer from this infirmity.

Parts a-e and part i of question 1 seek general information regarding collection practices. (For purposes of convenience, the full text of each of the OCA interrogatories at issue is attached to this pleading.) There is no apparent connection between the information requested and issues specific to collection service on holidays. Part h, in contrast, does relate specifically to holidays, and it appears plausible that parts f. and g. might have been posed to place in context information provided in

response to part h. The Postal Service will therefore attempt to respond to parts f.-h., but notes that the information available is not likely to be particularly enlightening.

In addition to seeking information that is irrelevant, parts b.-c. and i. of question 1 include sweeping requests for volume or transactional information that are potentially staggering in scope. For example, part b. requests an indication of when and under what circumstances in each of the last five years boxes were swept prior to the posted collection time, and part c. requests the volume of mail picked up early in FY 2000, and in each instance, the volume picked up the following day. Part i. seeks "all information" available on the frequency and accuracy of collection box pickups for each of the last five years, and further requests the volume of mail per collection box per pickup over that time. Merely to try to begin to identify what potentially responsive information exists in a retrievable format on these matters would be a massive undertaking, and would clearly constitute an undue burden. Particularly in the context of information that has no discernible relationship to the issue of holiday service, imposition of such a burden would be totally unjustified.

With respect to questions 3-10 and 12-13, each of these questions is directed at collection practices generally, and lacks any nexus to holiday issues.¹ The Postal Service therefore objects to responding to these questions on the grounds of relevance. With respect to question 3f., which relates to "quarterly collection tests" as mentioned in

¹ One perhaps arguable exception might be part b. of question 4, regarding the question of which calendar days are included in the calculation of service times. While adjustments for holidays have an impact on delivery service times, delivery matters are not within the scope of this proceeding. In any event, the requested information is already available within Appendix IX of USPS-LR-I-326, filed in Docket No. R2000-1.

a specified section of the POM, and requests "a copy of each data analysis performed and all reports provided management regarding the collection test results" from each of the last five years, the Postal Service further objects on the grounds of undue burden. Once again, the OCA is casting its net so wide, seeking information that conceivably could exist at every level of the organization, that the burden involved in identifying *potentially responsive information could approach the magnitude of the burden involved in producing the information*, and is totally unwarranted with respect to information which bears no relationship to the matters at issue in this proceeding.


Therefore, the Postal Service objects to OCA/USPS-1(a-e, i), 3 - 10, and 12 - 13 on the grounds stated above.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux
Chief Counsel
Ratemaking



Eric P. Koetting
Attorney

CERTIFICATE OF SERVICE

I hereby certify that, in accordance with section 12 of the Rules of Practice, I have this day served the foregoing document upon:

Douglas F. Carlson
P.O. Box 7868
Santa Cruz CA 95061-7868

David B. Popkin
P.O. Box 528
Englewood NJ 07631-0528



Eric P. Koetting

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2992/ FAX: -5402
June 8, 2001

OCA/USPS-1. The following interrogatories refer to the mail pickup times listed on USPS mail collection boxes. Also, please refer to POM 8, section 313.1 and 313.2

- (a) Do sections 313.1 and 313.2 reflect the Postal Service's policy regarding mail pickup times? If not, please provide a copy of the publication that states the Postal Service's actual policy.
- (b) Section 313.1 indicates that collections be made "as near as possible to the posted pickup time, but not before posted times for specific trips."
 - (1) For each of the past five years, is the Postal Service aware of any mail being picked up prior to posted times? Please identify all documents examined in preparing this response.
 - (2) If your response to part '(b)(1)' of this interrogatory is affirmative, please indicate when and under what circumstances mail was picked up prior to the times posted on collection boxes?
- (c) For FY 2000, what volume of mail was picked up earlier than the posted collection times? For each instance of an early pickup time, please provide the volume of collection mail picked up on the following day.
- (d) POM 8 section 313.2 indicates that "motorized collections ... should be made no later than 20 minutes after the posted time." What is the Postal Service's current policy regarding mail pick-ups occurring after the time(s) posted on collection boxes? Please provide a copy of the publication that states the Postal Service's actual policy.
- (e) Please describe the impact upon further mail processing when collection mail is picked up later than the designated time posted on the box.
- (f) For each of the past five years, please provide an estimate of the quantity of mail entered into the U.S. postal mail stream via mail collection boxes.
- (g) For each of the past five years, please provide an estimate of the quantity of mail entered into the U.S. postal mail stream on Sundays via mail collection boxes.
- (h) For each of the past five years and delineated by holiday, please provide: (1) an estimate of the quantity of mail entered into the U.S. postal mail stream on the designated holiday via collection boxes, and (2) the volume of mail entered into the U.S. postal mail stream via collection boxes on the day following the specified holiday.
- (i) For each of the past five years, please provide all information available on the frequency and accuracy of collection box pickup times. Also, include in the data provided the volume of mail per collection box per pickup. If the information is available in electronic format, provide the data as an ASCII formatted file with a description of the data to include but not limited to field descriptions, field length and field format.

OCA/USPS-3. The following refers to POM Issue 8, July 16, 1998, updated through May 4, 2000. Section 314 mentions quarterly "collection tests."

- (a) Please provide a copy of the plastic collection test card D-1148 and Form 3702, Test Mailing Record (Collection and special test mailings).

- (b) Please provide a current copy of Handbook M-39, Management of Delivery Services.
- (c) How many years has the Postal Service conducted the "collection tests?"
- (d) Who is responsible for conducting the collection tests?
- (e) How is the information gathered from the collection tests used by USPS management?
- (f) For each of the past five years, please provide a copy of each data analysis performed and all reports provided management regarding the collection test results.

OCA/USPS-4. The following interrogatory refers to the Postal Service's formula for calculating the percentage of mail delivered on time.

- (a) Please provide the current formula used to calculate the percentage of mail delivered on time. If the calculation used differs depending on the class or subclass of mail, please provide each formula used and identify the applicable mail class or subclass.
- (b) In determining the number of days it takes to deliver a mail piece, please provide the following information:
 - (1) Does the Postal Service include each and every day of a Julian calendar year when calculating the number of delivery days?
 - (2) If the response to part (b)(1) of this interrogatory is other than affirmative, please specifically identify each and every day that would not be included in the calculation of the number of days to deliver.

OCA/USPS-5 Who is responsible for establishing the USPS mail collection box pickup times?

OCA/USPS-6. Who is responsible for monitoring the timeliness of collection box pickups?

OCA/USPS-7. Where is collection box mail taken once it has been retrieved? For example, the local DDU, SCF or BMC?

OCA/USPS-8. Who is responsible for coordinating collection box pickups and then transporting that box mail to a mail processing facility?

OCA/USPS-9. Describe all methods used to monitor the timeliness of USPS collections from collection boxes.

OCA/USPS-10. Describe all methods used to track the processing of collection box mail once it has been retrieved from the box.

OCA/USPS-12. Has the USPS conducted or does it know of any analysis performed that studies customers' perceptions of the type of service mail receives after it is deposited in a USPS street collection box? If so, please provide a copy of the analysis. If none has been performed, please explain why none has been conducted.

OCA/USPS-13. The following interrogatory refers to POM Issue 8, July 15, 1998, updated through May 4, 2000.

- (a) Section 315.1 refers to the decals prescribed by the Corporate Identity Policy at Headquarters and Handbook MS-22, Street Letter Box Maintenance.
 - (1) Please provide a current copy of the Corporate Identity Policy.
 - (2) Please provide a current copy of Handbook MS-22.
- (b) Section 321.4 states: "These collection times should be augmented as necessary to ensure that local mail deposited in these boxes meets established delivery service standards."
 - (1) Does mail deposited in a collection box have a unique set of delivery service standards? If so, please provide a copy of the unique standards.
 - (2) For each and every mail class and subclass, please provide a copy of the established delivery service standards.